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*Attorney for Objector William Thomas Haynes,  
as trustee for the benefit of W Thomas and Katherine Haynes  
Irrevocable Trust for the benefit of Sara L. Haynes*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**IN RE PETROBRAS SECURITIES  
LITIGATION**

Case No. 14-CV-9662 (JSR)

**CLASS ACTION**

**NOTICE OF MOTION FOR RECONSIDERATION OF ORDER  
AWARDING ATTORNEYS' FEES AND TO DEFER FURTHER RULING  
ON THE MOTION UNTIL APPEAL CONCLUDES**

To: All Counsel

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law dated August 21, 2018, and the public filings on the docket and such other materials as the Court may consider, William Thomas Haynes, as trustee for the benefit of W Thomas Haynes and Katherine Haynes Irrevocable Trust for the benefit of Sara L. Haynes (“Haynes), respectfully moves pursuant to Local Civil Rule 6.3 and Rule 59(e) of the Federal Rules of Civil Procedure for reconsideration of the order awarding Haynes attorneys’ fees (Dkt. 866) and to defer further ruling on Haynes’s motion requesting attorneys’ fees (Dkt. 839) until after lead plaintiff’s appeal in *In re Petrobras Securities Litigation*, No. 18-2324 (2d Cir.) concludes.

Dated: August 21, 2018

Respectfully submitted,

/s/ Anna St. John

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**Certificate of Service**

The undersigned certifies she electronically filed the foregoing Notice of Motion for Reconsideration of Order Awarding Attorneys' Fees and to Defer Further Ruling on the Motion Until Appeal Concludes via the CM/ECF system for the Southern District of New York, thus sending the Notice of Motion to the Clerk of the Court and also effecting service on all attorneys registered for electronic filing.

Dated: August 21, 2018

/s/ Anna St. John  
Anna St. John